

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

STACY ARNOLD,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 19-06137-CV-SJ-BP
CITY OF ST. JOSEPH,)	
ST. JOSEPH PUBLIC LIBRARY,)	
OFFICER REBECCA HAILEY (IN HER)	
PERSONAL AND PROFESSIONAL CAPACITY))	
AND ROGER CLARY)	
)	
)	
Defendants)	

**OBJECTIONS AND RESPONSES TO PLAINTIFF’S FIRST REQUEST FOR
ADMISSIONS FOR DEFENDANT OFFICER REBECCA HAILEY**

COMES NOW Defendant Rebecca Hailey, by counsel, and provides the following objections and responses to Plaintiff’s First Request for Admissions.

1. Admit that Exhibit E from Plaintiff’s *First Amended Complaint* is a true and correct depiction of events on January 30, 2018. Should you not admit any part of the recording, please differentiate between parts you admit and parts that you dispute.

ANSWER:

Defendant admits only that the 58-second cell phone recording of a small portion of the interaction between Plaintiff and Defendant on January 30, 2018 speaks for itself. Defendant denies it is a complete recording of the events or persons involved in the interactions between Plaintiff and Defendants (including former Defendant Clary). Defendant also objects to the request to apparently provide a narrative account of each and every fact or statement that occurred during the interaction between Plaintiff and Defendants on January 30, 2018, as overbroad, unduly burdensome, argumentative and not proportionate to the claims made in the case.

2. Admit that the document attached hereto as Exhibit 1 is a true and authentic copy of Plaintiff's police report/case report regarding case 2018 – 7401.

ANSWER:

Admit only that the documents speak for themselves as records disclosed previously by Defendants under Rule 26.

3. Admit that the document attached hereto as Exhibit 2 is a true and authentic copy of Plaintiff's ticket, citation number 150081960.

ANSWER:

Admit only that the documents speak for themselves as records disclosed previously by Defendants under Rule 26.

4. Admit that the first page of the document attached hereto as Exhibit 3 is also a true and authentic copy of Plaintiff's ticket, citation number 150081960.

ANSWER:

Admit only that the documents speak for themselves as records disclosed previously by Defendants under Rule 26.

5. Admit that the document attached hereto as Exhibit 4 is a true and authentic copy of Plaintiff's call for service report regarding case 2018 – 7401.

ANSWER:

Admit only that the documents speak for themselves as records disclosed previously by Defendants under Rule 26.

Respectfully submitted,

BATY OTTO CORONADO PC

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ATTORNEYS FOR DEFENDANTS CITY
OF ST. JOSEPH AND REBECCA HAILEY

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2020, the above and foregoing document was served via electronic mail in PDF format to:

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